

EXHIBIT “A”

Cory Itkin

From: Celia Guerra <cguerra@brock.law>
Sent: Thursday, June 16, 2022 7:35 AM
To: Cory Itkin
Cc: Cory Team; cwright@rpsalaw.com; dtrevino@rpsalaw.com; Jason Itkin; jpauerstein@rpsalaw.com; maria-mandujano-9715@ecf.pacerpro.com; Noah Wexler; Denise Doonkeen; Clari A. Feuerbacher; Brenda L. Lawrence; Mark R. Strandmo; Patricia Cantu; John A. Guerra; Julie Forner
Subject: Re: 7840-001 Jennifer Gillis, et al. v. Community Products, LLC, et al.

Yes that's fine

Sent from my iPhone

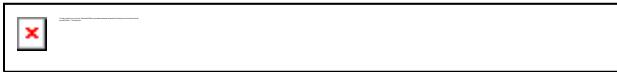
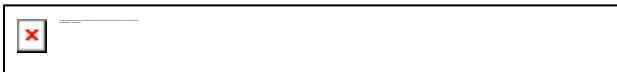
On Jun 15, 2022, at 9:40 PM, Cory Itkin <citkin@arnolditkin.com> wrote:

Thanks. Happy to work with you on the topics for the depo.

I am going to ask for a 70 day extension. I am guessing that should be sufficient to get a depo scheduled and getting some documents back to the written requests we are sending. I assume that's ok, but let me know if I'm mistaken.

Cory Itkin

Trial Lawyer



From: Celia Guerra <cguerra@brock.law>
Sent: Wednesday, June 15, 2022 4:55 PM
To: Cory Itkin <citkin@ArnoldItkin.com>; Cory Team <CoryTeam@ArnoldItkin.com>; cwright@rpsalaw.com; dtrevino@rpsalaw.com; Jason Itkin <jitkin@ArnoldItkin.com>; jpauerstein@rpsalaw.com; maria-mandujano-9715@ecf.pacerpro.com; Noah Wexler

<nwexler@ArnoldItkin.com>; Denise Doonkeen <ddoonkeen@rpsalaw.com>
Cc: Clari A. Feuerbacher <cfeuerbacher@brock.law>; Brenda L. Lawrence <blawrence@brock.law>; Mark R. Strandmo <mstrandmo@brock.law>; Patricia Cantu <pcantu@brock.law>; John A. Guerra <jguerra@brock.law>; Julie Forner <jforner@brock.law>
Subject: RE: 7840-001 Jennifer Gillis, et al. v. Community Products, LLC, et al.

Hi Cory,

We are unopposed to extending the deadline for Plaintiffs to respond to the motion to dismiss.

We will review the topics listed below to begin identifying the appropriate witness(es) and will get back to you regarding their availability for deposition. However, some of these topics go beyond the permissible scope of jurisdictional discovery and will need to be more narrowly tailored. I will follow up with a list of specific topics of concern.

Celia E. Guerra | Attorney
cguerra@brock.law



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From: Cory Itkin <citkin@ArnoldItkin.com>
Sent: Wednesday, June 15, 2022 10:47 AM
To: Celia Guerra <cguerra@brock.law>; Cory Team <CoryTeam@ArnoldItkin.com>; cwright@rpsalaw.com; dtrevino@rpsalaw.com; ecarrillo@rpsalaw.com; Jason Itkin <jitkin@ArnoldItkin.com>; jpauerstein@rpsalaw.com; jreed@rpsalaw.com; lchapa@rpsalaw.com; maria-mandujano-9715@ecf.pacerpro.com; Noah Wexler <nwexler@ArnoldItkin.com>
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Celia-

We intend to file a motion to extend the response date for Church Communities' Motion to Dismiss until we can conduct jurisdictional discovery. Please let us know if you are opposed/unopposed.

On a related note, we would like to take a jurisdictional corporate rep deposition of Church Communitys NY Inc. who is best able to testify about the following topics:

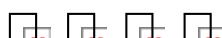
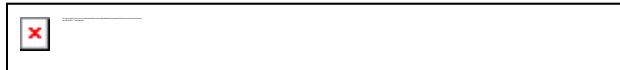
1. The relationship between Church Communities NY Inc. ("Church Communities") and Community Products, LLC ("Community Products"), including:
 - a. the organizational structure (i.e. member managed, manager managed) of Community Products and Church Communities' role in the organizational structure;
 - b. whether Church Communities receives any financial benefit, i.e., a portion of the revenue or profits, from Community Products, including but not limited to revenue or profits generated by Rifton Equipment;
 - c. any contractual or verbal agreements between Church Communities and Community Products;
 - d. communications between Church Communities and Community Products;
 - e. communications related to Church Communities' input, management, direction, control, etc. related to Community Products product development, testing, manufacturing, marketing, labeling, sales, and distributions; and
 - f. communications related to the subject incident between Church Communities and Community Products.
2. Church Communities' knowledge of advertising, solicitation, marketing, or other sales promotions and efforts used by Church Communities or Community Products in Texas since 2000 to present.
3. Church Communities' relationship with each of the named parties to this lawsuit.
4. Church Communities' knowledge of any and all lawsuits that were brought by Texas residents, occurred within the state of Texas, or both and involved Church Communities, or any prior legal name.
5. Church Communities' knowledge of any and all incidents, accidents, or deaths that involved Texas residents or that occurred within the state of Texas and involved Community Product's products.
6. The nature and extent of travel to the state of Texas by any Church Communities' employee, director, trustee, and/or other third party under Church Communities control (i.e., attorneys), including but not limited to travel to Texas for incident investigations, sales visits, or any other business purpose.
7. The number of products Church Communities has shipped, sold, leased, or loaned to Texas persons and/or entities and the approximate value of those sales or services.

8. Church Communities' efforts to ensure that its products would not be sold, leased, or loaned to, marketed to, or used by Texas residents or entities or within Texas borders.
9. The factual bases for any defenses to personal jurisdiction that Church Communities is asserting.
10. Church Communities' involvement, input, management, direction, control, etc. related to Community Products product development, testing, manufacturing, marketing, labeling, sales, and distributions of Community Products, including Rifton Equipment.
11. The factual bases for Church Communities' Motion to Dismiss.
12. The factual bases for any of Church Communities' answers or responses to Plaintiffs' Jurisdictional Discovery.
13. The search for and location of documents responsive to Plaintiffs' Jurisdictional Discovery (requests for production).

Please provide us with dates that you can present a witness. Thanks.

Cory Itkin

Trial Lawyer



From: Celia Guerra <cguerra@brock.law>

Sent: Wednesday, June 8, 2022 2:57 PM

To: Cory Itkin <citkin@ArnoldItkin.com>; Cory Team <CoryTeam@ArnoldItkin.com>; cwright@rpsalaw.com; dtrevino@rpsalaw.com; ecarrillo@rpsalaw.com; E-Service <e-service@ArnoldItkin.com>; JAITeam <JAITeam@ArnoldItkin.com>; Jason Itkin <jitkin@ArnoldItkin.com>; jpauerstein@rpsalaw.com; jreed@rpsalaw.com; lchapa@rpsalaw.com; maria-mandujano-9715@ecf.pacerpro.com; Noah Wexler <nwexler@ArnoldItkin.com>

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